EXHIBIT A

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From: Gindler, David
Sent: Tuesday, June 27, 2006 12:18 PM
To: Anthony K. Bruster Esq. (Akbruster@nixlawfirm.com); Rod Cooper Esq. (rcooper@cooperiplaw.com)
Cc: Rosenblatt, Betsy; Weiss, Andrew
Subject: City National Bank's Motion to Dismiss for Improper Venue

Gentlemen,

I am writing in connection with CNB's motion to dismiss for improper venue and DTC's motion to conduct jurisdictional discovery. While we believe that the Court can and should rule on our motion to dismiss without any discovery, we are prepared to compromise and would be willing to agree to the following discovery in advance of a ruling on our motion to dismiss:

1. Depositions of each person who signed a declaration, limited to one hour of questioning by DTC's counsel, followed by no more than 30 minutes of questioning by CNB, limited to the scope of DTC's examination.

2. One 30b6 deposition limited solely to personal jurisdiction issues, not to exceed one hour, followed by no more than 30 minutes of questioning by DTC, limited to the scope of DTC's examination.

3. All witnesses will be deposed in the county in which they live.

4. Five narrowly crafted document requests limited solely to personal jurisdiction issues. The document requests shall specify with particularity the documents to be produced, and shall avoid using "open textured language" such as "all documents referring or relating to [some subject matter]."

5. All of the foregoing discovery shall be completed within 20 days.

6. Within five court days after the completion of the foregoing discovery, DTC may submit a supplemental brief, not to exceed five pages (excluding attachments).

7. Within five court days, CNB may file a responsive supplemental brief, not to exceed five pages (excluding attachments).

Let me know if the foregoing is acceptable to you. I look forward to hearing from you.

David Gindler

Counsel for City National Bank